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Co-Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE DYNAMIC RANDOM ACCESS
MEMORY (DRAM) ANTITRUST
LITIGATION

Master File No. M-02-1486-PJH

MDL No. 1486

**~~PROPOSED~~ ORDER GRANTING
CLASS REPRESENTATIVE
INCENTIVE AWARDS**

THIS DOCUMENT RELATES TO:

ALL DIRECT PURCHASER ACTIONS.

Judge: Hon. Phyllis J. Hamilton
Courtroom : 3, 17th Floor

[PROPOSED] ORDER GRANTING CLASS REPRESENTATIVE INCENTIVE AWARDS -
M-02-1486 PJH

1 WHEREAS, on August 15, 2007, the Court held a hearing on Plaintiffs' Motion for an
2 Award of Attorneys' Fees, Reimbursement of Expenses, and Class Representative Incentive
3 Awards (the "Hearing");

4 WHEREAS, class counsel requested that the Court award \$10,000 each to the named
5 class representatives in the Third Consolidated Amended Complaint;

6 WHEREAS, at the Hearing, the Court asked class counsel to supply the Court with a
7 declaration from counsel that outlined on an individual basis the degree to which the
8 representative plaintiffs participated in the litigation and the degree to which that participation
9 has resulted in a benefit to the overall class action;

10 WHEREAS, class counsel has provided the court with the Declaration of Guido Saveri in
11 Support of Class Representative Incentive Awards;

12 WHEREAS, each named class representative has made significant contributions of time
13 and effort that have resulted in a benefit to the overall class action;

14 WHEREAS, each named class representative, at a minimum, performed the following
15 tasks: 1) met with counsel to discuss and provide input in the drafting and filing of their original
16 complaint; 2) searched for and provided documentation to their counsel regarding their direct
17 purchases of DRAM during the class period; 3) assisted counsel in drafting responses and
18 providing documents to several sets of written discovery, including signing verifications to
19 same; 4) reviewed and commented on major pleadings in the case; 5) assisted counsel in
20 researching and understanding the DRAM industry and developing the theories of the case; 6)
21 prepared for and had their deposition taken; 7) conducted supplemental searches for additional
22 documents following their depositions and expanded class period allegations in amended
23 complaints; 8) kept in contact with counsel during the course of the litigation and provided
24 counsel with all necessary information; and 9) were prepared to testify had the case proceeded to
25 trial.

26 WHEREAS, the Court finds awarding incentive payments of \$10,000 each to the named
27 class representatives in the Third Consolidated Amended Complaint to be reasonable;

28 THEREFORE, IT IS HEREBY ORDERED that Co-Lead Counsel are authorized to and

shall pay to:

- (1) **onShore, Inc.**, as named class representative, \$10,000;
- (2) **Internet Integration**, as named class representative, \$10,000;
- (3) **Kevin Irwin d/b/a Kevin's Computer and Photo**, as named class representative, \$10,000;
- (4) **PC Doctor, Inc.**, as named class representative, \$10,000;
- (5) **Advance Technology, Inc.**, as named class representative, \$10,000;
- (6) **Network Business Solutions, Inc.**, as named class representative, \$10,000;
- (7) **JEM Electronics Distributors, Inc.**, as named class representative, \$10,000;
- (8) **Daniel Clement**, as named class representative, \$10,000;
- (9) **Web Ideals, LLC**, as named class representative, \$10,000; and
- (10) **5207, Inc.**, as named class representative, \$10,000.

Dated: August 23, 2007.



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